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FEDERAL COMMUNICATIONS COMMISSION
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November 13, 2000

VIA HAND DELIVERY

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

Re: IB Docket No. 98-172

Dear Ms. Salas:

On behalf of the Fixed Wireless Communications Coalition ("FWCC"), we are filing an original and four (4) copies of its Comments in the above-referenced matter.

If there are questions, do not hesitate to call the undersigned at (703) 812-0480.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard R. Raish
Co-Chairman

LRR:cej
Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Redesignation of the 17.7-19.7 GHz Frequency)
Band, Blanket Licensing of Satellite Earth)
Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz)
Frequency Bands, and the Allocation of)
Additional Spectrum in the 17.3-17.8 GHz and)
24.75-25.25 GHz Frequency Bands for)
Broadcast Satellite-Service Use)

IB Docket No. 99-172

To: The Commission

**COMMENTS BY
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition ("FWCC")¹ hereby submits The Comments below in the above-captioned proceeding. Specifically, the FWCC supports (1) Petition for Clarification and Reconsideration of WINSTAR Communications Inc., (2) the WINSTAR Opposition to the Petition for Partial Reconsideration filed by Hughes Electronics Corporation, and (3) the Opposition of the Independent Cable & Telecommunications Association.

The clarification and reconsideration requested by WINSTAR will avoid future

¹The Fixed Wireless Communications Coalition is a coalition of equipment manufacturers and users interested in terrestrial fixed microwave communications. Its membership includes manufacturers of microwave equipment, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. Its membership also includes railroads, public utilities, petroleum and pipelines entities, public safety agencies, the broadcast industry, and their respective associations, telecommunications carriers, landline and wireless, local and interexchange carriers, and others. A list of members is attached as Appendix A.

misunderstandings and unreasonable courses of action. The Commission is urged to take into account the continued explosive growth of the Fixed Service (FS) market. The FWCC concurs the use of "other media", as pointed out by WINSTAR, is not a reasonable option in most cases where microwave communications are involved.

The FWCC also supports the Comments being filed separately in this proceeding by the Independent Cable & Telecommunications Association with regard to the Hughes Electronic Corporation Petition for Partial Reconsideration. The use of 440 MHz (18.140-18.580 GHz) of continuous spectrum is essential to the viability of the Private Cable Operators to remain competitive vis-a-vis franchised cable systems. The FWCC feels the points raised by Hughes and as pointed out by ICTA, are not new and have already been considered in this proceeding.

Respectfully submitted,

FIXED WIRELESS COMMUNICATIONS
COALITION

By: 
Leonard R. Raish
Co-Chairman

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(703) 812-0400

Date: November 13, 2000

FIXED WIRELESS COMMUNICATIONS COALITION

The Fixed Wireless Communications Coalition was formed by terrestrial fixed microwave users and suppliers to assure that adequate spectrum resources are available for current and future terrestrial fixed microwave communications. Such action is necessary because spectrum allocation and re-allocation actions currently under consideration at the FCC require fixed microwave interests to speak with a common voice. Additionally, the Coalition works for a regulatory climate both at the FCC and the ITU that permits the manufacture, operation, and use of terrestrial fixed microwave systems.

MEMBERS

USERS

Association of Public-Safety Communications Officials
UTC - The Telecommunications Association
National Association of Broadcasters
American Petroleum Institute
Wireless Communications Association International
Personal Communications Industry Association
Independent Cable Telecommunications Association
CBS Communications Services
Norfolk-Southern Railroad
Union Pacific Railroad
Burlington-Northern Railroad
BellSouth
SBC Communications, Inc.
People's Choice TV
Association of American Railroads
WINSTAR Communications Inc.
DIVEO Broadband Networks
XO COMMUNICATIONS

MANUFACTURERS

Harris Corporation -- Microwave Communications Division
Alcatel Network Systems Inc.
DMC STRATEX Networks
Tadiran Microwave Networks
MOTOROLA Inc.
Nortel Networks
P-Com, Inc.
LUCENT Technologies
Adaptive Broadband Inc.

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September 29, 2000